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August 26, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

Re: MM Docket No. 93-215

Dear Mr. Caton:

On behalf of TCA Cable, Inc., the purpose of this letter is to include TCA Cable, Inc. as a party to the "Comments of Cable Operators and Associations" filed August 25, 1993 in the referenced proceeding. TCA Cable, Inc. should be added to the list of participating cable operators as follows: Footnote 1 in summary on page i, Footnote 1 on page 1, and Page 106.

We are submitting an original and eleven copies of the revised pages.

Respectfully submitted,

John D. Seiver
Counsel for TCA Cable, Inc.

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JOINT COMMENTERS' SUMMARY^{1/}

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Pursuant to Congressional mandate, the Commission is now faced with the task of regulating rates for the provision of cable service in markets not "effectively" competitive. Rate regulation has existed in many forms at state and federal levels for almost one hundred years with regards to traditional public utilities (electricity, gas, telephone as well as other statutory monopolies (transit)). The rules governing traditional utilities, however, do not reflect the unique nature and operation of the cable industry which must be recognized when establishing principles for cable rate regulation and essential to a proper balancing of subscriber and investor interests.

Whatever form of rate regulation the Commission imposes on cable system operators must not contravene the Fifth

^{1/} The participating cable operators include: KBLCOM, Inc., Century Communications Corp., Jones Intercable, Inc., Scripps Howard Cable Company, TeleCable Corporation, Bresnan Communications Corp., Greater Media, Inc., Monmouth Cablevision Associates, Rifkin & Associates, Simmons Communications, Inc., Western Communications Alaskan Cable Network, Inc., Allen's Television Cable Service, Inc., Brownwood Television Cable Service, Inc., CableAmerica Corp., CableSouth, Inc. Cable USA, Inc., Columbus TV Cable Corp., Coosa Cable Company, Inc., Corsicana Cable TV, Gilmer Cable Television Co., Inc., Grassroots Cable Systems, Inc., Halcyon Communications, Inc., Helicon Corp., James Cable Partners, OCB Cablevision, Inc., Phoenix Leasing, Inc., Rock Associates, Satcom, Inc., Sjoberg's, Inc., Starstream Communications, Sweetwater Television Company, TCA Cable, Inc. United Video Cablevision, Inc., Zylstra Communications Corp. The participating state associations include: Cable Television Assn. of Georgia, South Carolina Cable Television Assn., Tennessee Cable Television Assn., Texas Cable TV Assn.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

| | | |
|--------------------------------------|---|----------------------|
| Implementation of Sections of the |) | |
| Cable Television Consumer Protection |) | |
| and Competition Act of 1992 |) | MM Docket No. 93-215 |
| |) | |
| Rate Regulation |) | |

COMMENTS OF CABLE OPERATORS AND ASSOCIATIONS^{1/}

On behalf of the cable television operators and state cable associations listed in footnote 1, we submit the following comments in response to the Commission's Notice of Proposed Rulemaking on proposed cost-of-service requirements to be implemented as part of the Commission's overall rate regulation for cable television operators.^{2/} The MSOs participating in these

^{1/} The participating cable operators include: KBLCOM, Inc., Century Communications Corp., Jones Intercable, Inc., Scripps Howard Cable Company, TeleCable Corporation, Bresnan Communications Corp., Greater Media, Inc., Monmouth Cablevision Associates, Rifkin & Associates, Simmons Communications, Inc., Western Communications Alaskan Cable Network, Inc., Allen's Television Cable Service, Inc., Brownwood Television Cable Service, Inc., CableAmerica Corp., CableSouth, Inc. Cable USA, Inc., Columbus TV Cable Corp., Coosa Cable Company, Inc., Corsicana Cable TV, Gilmer Cable Television Co., Inc., Grassroots Cable Systems, Inc., Halcyon Communications, Inc., Helicon Corp., James Cable Partners, OCB Cablevision, Inc., Phoenix Leasing, Inc., Rock Associates, Satcom, Inc., Sjoberg's, Inc., Starstream Communications, Sweetwater Television Company, TCA Cable, Inc. United Video Cablevision, Inc., Zylstra Communications Corp. The participating state associations include: Cable Television Assn. of Georgia, South Carolina Cable Television Assn., Tennessee Cable Television Assn., Texas Cable TV Assn.

^{2/} The Notice of Proposed Rulemaking, released July 16, 1993 ("NPRM"), followed the Commission's earlier Report and Order

Respectfully submitted,

By: 

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**Attorneys for the following
Cable Operators and Associations:**

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munications Corp., Greater Media,
Inc., Monmouth Cablevision Associ-
ates, Rifkin & Associates, Simmons
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munications Alaskan Cable Network,
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